

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ROBERT FRERCK,

Plaintiff,

v.

JOHN WILEY & SONS, INC.,

Defendant.

CASE NO. 11-cv-02727

Hon. Robert M. Dow Jr.

Magistrate Judge Geraldine Soat Brown

**DECLARATION OF LISA SUAREZ  
IN SUPPORT OF  
DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, **Lisa Suarez**, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am employed by Defendant John Wiley & Sons, Inc. ("Wiley") as a Senior Manager of Inventory in the Finance and Operations department of the Global Education publishing division. I respectfully submit this declaration, based upon my personal knowledge and review of documents provided to me, in support of Wiley's Motion for Partial Summary Judgment.

2. In connection with this motion, I have reviewed a spreadsheet prepared by Wiley that contains the most complete and current data as to the print runs of the publications at issue in this case. I have been informed that this spreadsheet was produced by Wiley to Plaintiff Robert Frerck as WFRERCK 004555. Based on my review, I can confirm the following statements:


- a. Wiley has not printed more than 10,000 copies of *Regional Landscapes*, Fifth Edition, by Birdsall.
- b. Wiley has not printed any copies, nor distributed more than 50,000 copies, of *Frommer's Chicago 1999*.

c. Wiley has not produced more than 40,000 copies of *La Lengua Que Heredamos*, 6th edition.

3. Wiley has never published or distributed any edition of *The Aztecs: People of America* by Michael Smith.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 20, 2013  
Hoboken, New Jersey

By:   
Lisa Suarez